



Lassen Canyon Nursery, Inc.

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Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
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commentletters@waterboards.ca.gov

RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

My brother and I own Lassen Canyon Nursery, Inc. We grow about 350 million strawberry plants on 1300 acres that we sell to commercial strawberry fruit growers. Our headquarters is located in Redding, California. Our primary growing locations include a remote area of Siskiyou County, and a farm in San Joaquin County just south of Manteca. Our largest market is in Southern and Central California near the Monterey coast, but we also grow and sell strawberry plants to other strawberry nurseries. Those plants are grown and distributed all over the world.

I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and I am concerned that my ability to continue to farm will be unnecessarily negatively burdened by the Proposed Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already successful cooperative Irrigated Lands Regulatory Program, which has been in place for over a decade, are significant and costly. Given the precedential nature of the Proposed Order, it will not only have a severe impact on agricultural operations within the Central Valley, but throughout the state. Of particular concern to my farming operation is potential implication that other regional water boards besides this one will have the ability to update or develop their irrigated lands regulatory programs so that they are in line with this proposed order. Further, I am concerned that the proposed order removes prioritization by vulnerability designations to create annual reporting requirements for all members. Previously, as you know, only high vulnerability operations had additional regulatory requirements.

The new order would put additional burdens on farmers as far as record keeping. All farmers would have to participate in outreach events, update their farm evaluation annually, have certified Nitrogen Management Plants (NMP), and submit NMP summary reports to the coalition. Previously, these were only required for growers in high vulnerability areas. Coalitions would now also provide the raw data submitted by each grower to the Central Valley Water Board, making this data accessible to the general public. The coalition must submit all field-specific Farm Evaluation data identified by location. Previously, data was identified at the township level rather than by field location. Also, the coalition must submit all nitrogen application data by field and identified by location.

In addition, each farm would be required to monitor all drinking water supply wells, including land owner or tenant wells. Monitoring results would be submitted to the Central Valley Water Board in the Annual Monitoring Report. These requirements are extremely burdensome and put unreasonable hardships on our staff. I urge you to reconsider some of these points in the proposed Order.

Thank you for considering my views.

Respectfully submitted,



Elizabeth Elwood Ponce
Vice President
Lassen Canyon Nursery, Inc.